

Exhibit 29



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September 9, 2015

VIA ECF AND FEDERAL EXPRESS

Honorable Joel Schneider
United States Magistrate Judge
U.S. District Court - District of New Jersey
Mitchell S. Cohen Building & US Courthouse
1 John F. Gerry Plaza, Courtroom 3C
4th and Cooper Streets
Camden, NJ 08101

**Re: In re Benicar (Olmesartan) Products Liability Litigation
MDL No. 2606**

Dear Judge Schneider:

On behalf of the Daiichi U.S. and Forest Defendants, we are writing relating to the hold notice recipient lists discussed with Your Honor during the September 2 hearing and as set forth in Case Management Order No. 9. Plaintiffs requested in their August 11 ESI letter production of the Forest hold notices without redactions to the recipient lists for the purpose of evaluating and preparing suggestions of custodians in advance of the September 24 hearing. Our view, informed by Your Honor's decision in *Major Tours, Inc. v. Colorel*, No. CIV 05-3091, 2009 WL 2413631 at *2 (D.N.J. Aug. 4, 2009), was that such information was privileged in the absence of any evidence of spoliation.

Based on Mr. Slater's representation that this discovery is sought to enable him to evaluate the list of custodians whose documents will be searched, and in light of Your Honor's rejection of Mr. Slater's request for a 30(b)(6) deposition on the issue, and without waiver of privilege, the Forest defendants will produce an unredacted copy of the hold notice within one week. We do note that in connection with evaluation of the custodian list the Plaintiffs have close to 5 million pages of documents that have been produced so far, including INDs and NDAs for the four olmesartan products, FDA communications and submissions, custodial productions, and approximately 3,000 pages of Daiichi U.S. and Forest organizational documents to assist their efforts to identify a reasonable number of additional custodians beyond the names of the 86 custodians that they have had for seven months. We trust that Plaintiffs will use the list for the purposes they have articulated and not as a platform to conduct more "discovery about discovery."

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September 9, 2015
Page 2

As stated in Court, the Daiichi U.S. Defendants confirm that the hold notice relating to this litigation was sent to all employees.

We appreciate Your Honor's attention to this matter.

Respectfully submitted,

DRINKER BIDDLE & REATH LLP

s/ Susan M. Sharko

Susan M. Sharko

SMS/jlb
Enclosures

cc: All Counsel of Record (via ECF)